

**IN THE UNITED STATES DISTRICT
COURT FOR THE NORTHERN DISTRICT
OF ILLINOIS EASTERN DIVISION**

IN RE: TESTOSTERONE REPLACEMENT
THERAPY PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO ALL
CASES

MDL No. 2545

Master Docket Case No. 1:14-cv-01748

Honorable Matthew F. Kennelly

**APPLICATION OF SETH A. KATZ SEEKING APPOINTMENT
TO THE COMMON BENEFIT FEE COMMITTEE**

Seth A. Katz respectfully submits this application to be appointed to the *In re: Testosterone Replacement Therapy Products Liability Litigation* (MDL No. 2545) Common Benefit Fee Committee. In support thereof, Mr. Katz states the following:

I have been a member of the Plaintiffs' Executive Committee since the beginning of this litigation, and I and other members of our law firm have been actively involved in all aspects of the litigation. I personally oversaw discovery related to all defendants. I sat as first chair in Bellwether trials against both AbbVie and Auxilium. I was specifically responsible for conducting and overseeing the AbbVie generic discovery. In my role on the Executive Committee, and in overseeing discovery, I have first-hand knowledge of what lawyers and law firms worked for the common benefit of the MDL. Burg Simpson Eldredge Hersh & Jardine, P.C. has paid all of its capital contributions in this MDL in order to fulfill our obligation to finance this litigation.

In other litigations, such as the *In re: Yasmin and YAZ (Drospirenone) Marketing, Sales Practices and Products Liability Litigation* (MDL No. 2100), I have served on fee committees and am familiar with the way leadership groups assess common benefit contributions. Based on all of the above, I request to be appointed to the Common Benefit Fee Committee in this litigation.

Dated: October 26, 2018

Respectfully Submitted,

BURG SIMPSON
ELDREDGE HERSH & JARDINE, P.C.

/s/ Seth A. Katz

Seth A. Katz

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